

FILED  
CLERKS OFFICE  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

2005 OCT 11 P 12: 23

UNITED STATES OF AMERICA,  
Plaintiff,  
  
v.  
  
301 ADAMS STREET, QUINCY,  
MASSACHUSETTS; 1548-1558  
DORCHESTER AVENUE, DORCHESTER,  
MASSACHUSETTS; FIVE (5) CERTAIN  
PARCELS OF LAND WITH THE  
BUILDINGS(S) THEREON IN BROCKTON  
PLYMOUTH COUNTY, MASSACHUSETTS,  
COMMONLY KNOWN AS 11 ROSSETER  
STREET, 16 ROSSETER STREET,  
213-223 NORTH MAIN STREET, 204  
NORTH MONTELLO STREET, AND 227  
NORTH MAIN STREET, INCLUDING ALL  
APPURTENANCES AND IMPROVEMENTS  
THEREON; \$67,561.88 IN UNITED  
STATES CURRENCY; and \$26,776.42 IN  
UNITED STATES CURRENCY, SEIZED  
FROM ASIAN AMERICAN BANK CHECKING  
ACCOUNT NUMBER 310029269,  
Defendants.

**MOTION TO UNIMPOUND**

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves that this Court unimpound the Amended Verified Complaint for Forfeiture In Rem, including the attached amended affidavit; the Warrant and Monition; the Motion for Ex Parte Finding and Endorsement of Memorandum of Lis Pendens; and the three Lis Pendens, which were filed in connection with this instant civil action on or about May 18, 2005, and on or about December 9, 2004. The United States initially sought to impound these filings for a

brief period in order to avoid the substantial risk of jeopardizing an ongoing grand jury investigation, and in order to preserve grand jury secrecy to the maximum possible extent.

On or about September 28, 2005, the targets of the grand jury investigation were arrested, and are therefore, aware of the criminal investigation.

The United States hereby requests that this Court unimpound all of the documents which have been filed in this civil forfeiture action so that they may be promptly served upon any and all interested parties and their attorneys, along with any other individuals and/or financial institutions having or believed to have an interest in the properties identified in the Amended Verified Complaint which are subject to forfeiture.

WHEREFORE, the United States requests that the Court unimpound all of the documents listed above, which have been filed in this civil forfeiture matter.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: *Kristina E. Barclay /JHZ*  
KRISTINA E. BARCLAY  
Assistant U.S. Attorney  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3283

Dated: October 11, 2005

APPROVED AND SO ORDERED:

\_\_\_\_\_  
REGINALD C. LINDSAY  
UNITED STATES DISTRICT JUDGE  
Dated: \_\_\_\_\_, 2005